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Prepped by Charmelle Mathews

Document Number:

~~8101~~ 101) IV-D-85

Docket Number:

A-90-16

A-90-16
IV.D-85



JUL 23 1990

AUG 10 1990

July 11, 1990

Mary T. Smith
Director, Field Operations & Support Division
U.S. Environmental Protection Agency
401 M Street S.W.
Washington, DC 20460

Dear Ms. Smith:

Sinclair Oil Corporation submits the following comments on the Ethyl Corporation's application for EPA to grant a waiver allowing the gasoline additive methylcyclopentadienyl manganese, tricarbonyl (MMT). Sinclair strongly believes MMT is an impressive gasoline additive, capable of reducing mobile source emissions as well as yielding octane benefits, and we urge EPA to approve the waiver.

Sinclair is a small refiner as defined by the Clean Air Act and as such is limited by personnel and financial constraints. Unlike major oil companies with substantial research capabilities, Sinclair relies on commercially available and cost-effective additives in the formulation of our gasolines. The need to change fuel compositions in the 1990's will correspondingly require the availability of cost-effective additives such as MMT, especially for smaller facilities. Given the extraordinary costs refiners will incur with pending Clean Air legislation, which we believe will be enacted, Sinclair strongly believes requests such as the MMT waiver should be approved, absent conclusive evidence the additive raises serious health and safety concerns.

Sincerely,

Clint W. Ensign, Manager
Government Relations

cc: Mr. Dale Ensign, Executive Vice President
Sinclair Oil Corporation

The Honorable Jake Garn, United States Senate

The Honorable Orrin Hatch, United States Senate

Mr. David C. Wilson, Ethyl Canada Inc.